

EXHIBIT L

ARJUN VASAN
PLAINTIFF IN PRO PER
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ARJUN VASAN,
Plaintiff and Counter-Defendant,
v.
CHECKMATE.COM, INC.,
(dba "Checkmate")
Defendant and Counterclaimant.

Case No.: CV-765-MEMF-JPR

Hon. Maame Ewusi-Mensah Frimpong

**PLAINTIFF'S FIRST SET OF REQUESTS
FOR ADMISSION TO DEFENDANT
CHECKMATE.COM, INC.; "Lunchbox
Emails – November 7-8, 2024"**

Complaint Filed: January 28, 2025

TO DEFENDANT CHECKMATE.COM, INC. AND ITS COUNSEL OF RECORD:

Pursuant to Federal Rule of Civil Procedure 36, Plaintiff propounds the following Requests for Admission ("RFAs"). Each admission is to be answered in writing, under oath, within **30 days** after service unless the parties stipulate or the Court orders otherwise.

I. DEFINITIONS

1. **"You" / "Defendant"** means Checkmate.com, Inc. ("Checkmate"), including its officers, employees, agents, attorneys, and anyone acting on its behalf.
2. **"Document"** has the broad meaning in Fed. R. Civ. P. 34(a)(1)(A) and includes electronically stored information.

3. **“Email”** means an electronic message with headers, body, and any attachments, including the native **.eml** with full headers and MIME parts.
4. **“Attachment”** means any file attached to an Email, including all bytes, filename, size, and MIME metadata.
5. **“Audio File”** means a file whose content is audio and whose MIME begins audio/ (e.g., .wav, .mp3, .m4a).
6. **“Source Code”** means human-readable program text or scripts (e.g., files with extensions such as .py, .js, .ts, .java, .cpp, .c, .rb, .go, .ipynb, .sql, .sh, .ps1, etc.), and any file whose MIME indicates text/code.
7. **“Lunchbox Emails”** means the Emails exchanged **Nov. 7–8, 2024** between Plaintiff (from his personal Gmail account) and **Nabeel** (nabeel@lunchbox.com) concerning possible collaboration/employment, including the messages that attached files named **“lees-that-is-impressive.wav”** and **“MarcosRitaAmazing (1).wav.”** These emails were previously exhibited by Checkmate. (See Decl. of Vishal Agarwal, ECF No. 18-4).
8. **“Competitive Activity Allegations”** means the allegations in Defendant’s Counterclaims that (a) on or about Nov. 7–8, 2024 Plaintiff contacted a competitor and mentioned bringing two Checkmate engineers and shared recordings (§23); (b) Plaintiff breached a non-compete by contacting competitors in Nov. 2024 to solicit interest in acquiring the same code and employees (§52); and (c) Plaintiff attempted to pawn off the same code to a third party (§7).

II. INSTRUCTIONS

- A. Answer each RFA separately and fully as required by Rule 36. If You cannot admit or deny, state the reasons and describe the reasonable inquiry made.
- B. If an RFA is admitted in part and denied in part, specify which part is admitted and which is denied.
- C. These RFAs are continuing; if You later obtain information requiring amendment, promptly serve amended answers under Rule 26(e).

III. REQUESTS FOR ADMISSION

1 **RFA No. 1:** Admit that each **Attachment** to the **Lunchbox Emails** is an **Audio File**

2 (e.g., .wav, .mp3, .m4a) and **not** Source Code.

3 **RFA No. 2:** Admit that **none** of the Attachments to the Lunchbox Emails contains **Source Code**.

4 **RFA No. 3:** Admit that the Attachment named “**lees-that-is-impressive.wav**” in the Lunchbox
5 Emails is an **Audio File** and not Source Code.

6 **RFA No. 4:** Admit that the Attachment named “**MarcosRitaAmazing (1).wav**” in the Lunchbox
7 Emails is an **Audio File** and not Source Code.

8 **RFA No. 5:** Admit that You possess **no file** from the Lunchbox Emails whose MIME metadata
9 indicates a **text/code** type (including but not limited to text/plain, text/x-python, application/x-
10 javascript, or similar).

11 **RFA No. 6:** Admit that You possess **no file** from the Lunchbox Emails with a filename extension
12 commonly associated with Source Code (including but not limited
13 to .py, .js, .ts, .java, .cpp, .c, .ipynb, .rb, .go, .sql, .sh, .ps1).

14 **RFA No. 7:** Admit that the **bodies** of the Lunchbox Emails state that Plaintiff was sending **older**
15 **demo recordings** from prior work and do **not** state that Plaintiff was sending **Checkmate,**
16 **VoiceBite** or **Presto** Source Code.

17 **RFA No. 8:** Admit that You have **not** retained any expert or vendor who concluded that any
18 Attachment to the Lunchbox Emails is **Source Code**.

19 **RFA No. 9:** Admit that You have **not** computed or received any file hash or signature identifying
20 any Attachment to the Lunchbox Emails as **Source Code**.

21 **RFA No. 10:** Admit that You have **no document** (including any internal analysis) that identifies any
22 Attachment to the Lunchbox Emails as **Source Code**.

23 **RFA No. 11:** Admit that the Lunchbox Emails **do not** attach any repository export, archive, or
24 bundle (e.g., .zip, .tar, .gz, .7z) containing Source Code.

25 **RFA No. 12A:** Admit that the Lunchbox Emails **do not** attach any file named with or referring to a
26 **code repository, branch, commit, or hash** associated with **VoiceBite, Presto** or **Checkmate**.

27 **RFA No. 12B:** Admit that the Lunchbox Emails do not contain any URL to a repository (GitHub,
28 GitLab, BitBucket or similar).

1 **RFA No. 13:** Admit that You have **no evidence** that Plaintiff transmitted **Checkmate, VoiceBite** or
2 **Presto** Source Code to Lunchbox in the Lunchbox Emails.

3 **RFA No. 14A:** Admit that the **only** Attachments to the Lunchbox Emails in Your possession are
4 **Audio Files**.

5 **RFA No. 14B:** Admit that each such attachment has a MIME Content-Type beginning with audio/.

6 **RFA No. 15:** Admit that characterizing the Attachments to the Lunchbox Emails as “**code**” would
7 be **inaccurate** because they are **Audio Files**.

8 **RFA No. 16:** Admit that You are **able** to produce the Lunchbox Emails in **native .eml** format with
9 full headers and all Attachments in **native** format.

10 **RFA No. 17:** Admit that none of the Lunchbox Email Attachments includes any **text** segment that
11 contains programming syntax for a programming language.

12 **RFA No. 18A:** Admit that the body of the Lunchbox Emails does not contain the word “code”.

13 **RFA No. 18B:** Admit that You have **no record** that Lunchbox (or Nabeel) replied acknowledging
14 receipt of “code” from Plaintiff in the Lunchbox Emails.

15 **RFA No. 19:** Admit that none of the Lunchbox Email Attachments was marked or designated by
16 You as “**confidential code,**” “**source,**” “**trade secret code,**” or similar.

17 **RFA No. 20:** Admit that You have **no basis** to contend that the Lunchbox Email Attachments are
18 **anything other than Audio Files**.

19 **RFA No. 21:** Admit that, after a reasonable inquiry and as of the date of Your response, the **only**
20 Documents You **rely on** to support the **Competitive Activity Allegations** are the **Lunchbox Emails**
21 and their Attachments.

22 **RFA No. 22:** Admit that, after a reasonable inquiry and as of the date of Your response, You **do not**
23 **possess** any communication **from Plaintiff to any then-current Checkmate employee** expressly
24 asking that employee to **terminate** employment to accept a **specific role**.

25 **RFA No. 23:** Admit that, after a reasonable inquiry and as of the date of Your response, You **do not**
26 **possess** any communication **from Plaintiff to any Checkmate customer** requesting that the
27 customer **move existing business** from Checkmate.
28

RFA No. 24: Admit that, after a reasonable inquiry and as of the date of Your response, You **do not** possess any Document showing that **before November 14, 2024** Plaintiff **engaged in a “Competing Business”** as that term is used in any Checkmate agreement.

RFA No. 25: Admit that, after a reasonable inquiry and as of the date of Your response, You **do not** possess any communication (other than the Lunchbox Emails) in which Plaintiff **represented** that he **sent or would send source code** to **any** third party.

RFA No. 26: Admit that, after a reasonable inquiry and as of the date of Your response, You have **not identified any person** You contend Plaintiff actually **solicited** to leave Checkmate.

RFA No. 27: Admit that the **Lunchbox Emails** (dated November 7-8) post-date Plaintiff’s written demands for payment of his partial/signing bonus in early November 2024 (dated November 4).

VERIFICATION (for Responding Party)

I am authorized to respond to these Requests for Admission on behalf of Defendant. I have read the foregoing responses and, based on a reasonable inquiry, the matters stated therein are true and correct to the best of my knowledge and belief.

Dated: _____ Signature: _____

Name: _____ Title: _____

for Defendant Checkmate.com, Inc.

CERTIFICATE OF SERVICE (Rule 5(b)(2)(E))

I certify that on **August 16, 2025**, I served **Plaintiff's First Set** of Requests for Admission to Defendant Checkmate.com, Inc. (Set One — "Lunchbox Emails") by sending a true and correct copy via email to counsel of record at the addresses below:

Rebecca Makitalo
K&L Gates LLP
rebecca.makitalo@klgates.com

Ryan Q. Keech
K&L Gates LLP
ryan.keech@klgates.com

Stacey Chiu
K&L Gates LLP
stacey.chiu@klgates.com

10100 Santa Monica Blvd., 8th Floor
Los Angeles, California 90067
Phone: 310.552.5070

This Service was made by email pursuant to Fed. R. Civ. P. 5(b)(2)(E) (consent).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

/s/ **Arjun Vasan**

Dated: **August 17, 2025**

Arjun Vasan
Plaintiff In Pro Per

1 Ryan Q. Keech (SBN 280306)
Ryan.Keech@klgates.com
2 Stacey Chiu (SBN 321345)
Stacey.Chiu@klgates.com
3 Rebecca I. Makitalo (SBN 330258)
Rebecca.Makitalo@klgates.com
4 Jacob R. Winningham (SBN 357987)
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5 K&L GATES LLP
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7 Telephone: +1 310 552 5000
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8 *Attorneys for Defendant and Counterclaimant*
9 *CHECKMATE.COM INC.*

10
11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13
14 ARJUN VASAN,

15 Plaintiff,

16 v.

17
18 CHECKMATE.COM, INC.,

19 Defendant.

20
21 CHECKMATE.COM, INC.,

22 Counterclaim-Plaintiff,

23 v.

24
25 ARJUN VASAN,

26 Counterclaim-
27 Defendant.

Case No. 2:25-CV-00765-MEMF-JPR

Magistrate Judge Jean P. Rosenbluth

**CHECKMATE.COM, INC.'S
RESPONSES TO PLAINTIFF
ARJUN VASAN'S FIRST SET OF
REQUESTS FOR ADMISSIONS**

Complaint Filed: January 28, 2025
Amended Complaint Filed: February
21, 2025

1 PROPOUNDING PARTY: PLAINTIFF ARJUN VASAN

2 RESPONDING PARTY: DEFENDANT CHECKMATE.COM, INC.

3 SET NO.: ONE (1)

4 Defendant Checkmate.com, Inc. (“Defendant” or “Checkmate”) hereby
5 responds to Plaintiff Arjun Vasan (“Plaintiff” or “Vasan”)’s First Set of Requests for
6 Admission (the “Requests”), as follows:

7 **PRELIMINARY STATEMENT**

8 Checkmate’s investigation of the facts relating to this case is still ongoing.
9 As such, Checkmate has not completed its investigation, has not completed
10 discovery, and has not completed preparation for trial. All of the answers contained
11 herein are based upon the information presently available, and specifically known,
12 to Checkmate. It is anticipated that further discovery and further independent
13 investigation will supply additional facts which may clarify and add meaning to
14 facts presently known, as well as establish new factual matters, all of which may
15 lead to substantial addition to, changes in, and variations from the responses set
16 forth herein. The following responses are given without prejudice to Checkmate’s
17 right to produce evidence of any subsequently discovered fact or facts that
18 Checkmate may later recall.

19 The responses contained herein are made in a good faith effort to supply as
20 much factual information as is presently known, but should in no way be to the
21 prejudice of these parties in relationship to further discovery, research, or analysis.
22 Checkmate reserves the right to alter, supplement, amend, or otherwise modify these
23 responses in any way and at any time, including at or during trial, in light of facts
24 revealed to them through discovery, further investigation, or further legal analysis.
25 Checkmate also reserves the right to amend or supplement these responses with any
26 information that has been inadvertently or unintentionally omitted and/or to
27 introduce such information into evidence at the time of hearing or trial.

28 Checkmate makes these responses to the Requests subject to, and without

1 waiving in any way any objections as to competence, relevance, materiality,
2 propriety, and admissibility, and any and all other objections and grounds which
3 would require the exclusion of any statement herein if the Requests were asked of,
4 or any statements contained were made by, a witness present and testifying in Court,
5 all of which objections and grounds are reserved and may be interposed at time of
6 trial.

7
GENERAL OBJECTIONS

8 1. To the extent the Requests call for confidential communications
9 between Checkmate and any of its/his/her attorneys, or information that is otherwise
10 covered by the attorney-client privilege, the work-product doctrine, or any other
11 right or privilege recognized by California or federal law, Checkmate generally
12 objects to the Requests, and each request contained therein.

13 2. Checkmate objects to the Requests, and each request contained therein,
14 to the extent that they seek information protected by the California or United States
15 constitutions, California or federal statutes or case law that establish a right of
16 privacy and forbid the discovery and dissemination of confidential, sensitive and
17 financial information. Checkmate will not reveal such information where doing so
18 would violate the privacy rights of Checkmate or of third parties.

19 3. Checkmate objects to the Requests, and each request contained therein,
20 to the extent that they seek information that is not relevant and/or material to the
21 subject matter of this litigation or are not reasonably calculated to lead to the
22 discovery of admissible evidence.

23 4. Checkmate objects to the Requests, and each request contained therein,
24 insofar as they are repetitive, redundant or overlapping.

25 5. Checkmate objects to the Requests, and each request contained therein,
26 to the extent that they are unduly burdensome, oppressive, annoying or harassing.

27 6. Checkmate objects to the Requests, and each request contained therein,
28 to the extent that they are vague and ambiguous, compound, confusing,

1 unintelligible, unclear and amenable to different meanings, understandings or
2 interpretations. Checkmate is responding to each Request as it interprets and
3 understands that Request with respect to the issues framed in connection with this
4 litigation. If Checkmate asserts an interpretation of any part of a Request that
5 differs from the understanding of Checkmate, Checkmate reserves the right to
6 supplement, amend, or modify their responses or objections.

7 7. Checkmate objects to the Requests, and to each request contained
8 therein, to the extent they are unlimited in time or seek information beyond the time-
9 frame relevant to this litigation on the grounds that they are overbroad and unduly
10 burdensome, and seek information that is irrelevant to the subject matter of this
11 litigation.

12 8. Checkmate objects to the Requests, and each request contained therein,
13 to the extent they seek to impose duties or obligations different from, additional to,
14 or otherwise beyond those required by the Federal Rules of Civil Procedure.

15 9. Checkmate objects to the Requests, and each request therein, to the
16 extent they seek information that is equally available to or within Plaintiff's
17 possession, custody or control on the grounds that such Requests are unduly
18 burdensome and oppressive.

19 10. Checkmate objects to the definition of "You" / "Defendant" in that it is
20 vague, ambiguous, overbroad, and reflects an attempt to circumvent Federal Rule of
21 Civil Procedure 45. It is also objectionable to the extent it intrudes upon the
22 attorney/client privilege, work product, and/or other applicable privileges.

23 11. Checkmate objects to the definition of "Attachment" in that it is vague,
24 ambiguous, overbroad, and unduly burdensome.

25 12. Checkmate objects to the definition of "Audio File" in that it is vague,
26 ambiguous, overbroad, and unduly burdensome.

27 13. Checkmate objects to the definition of "Source Code" in that it is
28 vague, ambiguous, and overbroad, and unduly burdensome.

1 14. Checkmate objects to the definition of “Lunchbox Emails” in that it is
2 vague, ambiguous, overbroad, and unduly burdensome.

3 15. Checkmate objects to the definition of “Competitive Activity
4 Allegations” in that it is vague, ambiguous, overbroad, and unduly burdensome.

5 16. The foregoing objections are incorporated by reference into each of the
6 specific responses made herein. Notwithstanding the specific responses to any of
7 the Requests, Checkmate does not waive any of the general or specific objections
8 made herein.

9 17. Subject to and without waiving the foregoing General Objections,
10 Checkmate responds to Vasani’s First Set of Requests for Admissions as follows:

11 **RESPONSES TO REQUESTS FOR ADMISSION**

12 **REQUEST FOR ADMISSION NO. 1:**

13 Admit that each Attachment to the Lunchbox Emails is an Audio File (e.g.,
14 .wav, .mp3, .m4a) and not Source Code.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

16 Responding Party hereby incorporates the General Objections as though fully
17 set forth herein. Responding Party objects to this Request on the grounds that the
18 terms “Attachment,” “Lunchbox Emails,” “Audio File,” and “Source Code,” as
19 defined by Plaintiff, are vague, ambiguous, overbroad, and unduly burdensome.
20 Responding Party further objects that the Request seeks information that is neither
21 relevant to the subject matter of the action nor reasonably calculated to lead to the
22 discovery of admissible evidence. Responding Party further objects that the Request
23 seeks an expert opinion. Responding Party further objects that the Request is
24 compound, containing multiple distinct inquiries within a single request, which is
25 improper under the applicable Rules.

26 Without waiving the foregoing objections, Responding Party responds as
27 follows: Responding Party has made a reasonable inquiry and lacks sufficient
28 information to admit or deny the Request, and therefore denies on that basis.

1 **REQUEST FOR ADMISSION NO. 2:**

2 Admit that none of the Attachments to the Lunchbox Emails contains Source
3 Code.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

5 Responding Party hereby incorporates the General Objections as though fully
6 set forth herein. Responding Party objects to this Request on the grounds that the
7 terms “Attachment,” “Lunchbox Emails,” and “Source Code,” as defined by
8 Plaintiff, are vague, ambiguous, overbroad, and unduly burdensome. Responding
9 Party further objects that the Request seeks information that is neither relevant to the
10 subject matter of the action nor reasonably calculated to lead to the discovery of
11 admissible evidence. Responding Party further objects that the Request seeks an
12 expert opinion.

13 Without waiving the foregoing objections, Responding Party responds as
14 follows: Responding Party has made a reasonable inquiry and lacks sufficient
15 information to admit or deny the Request, and therefore denies on that basis.

16 **REQUEST FOR ADMISSION NO. 3:**

17 Admit that the Attachment named “lees-that-is-impressive.wav” in the
18 Lunchbox Emails is an Audio File and not Source Code.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

20 Responding Party hereby incorporates the General Objections as though fully
21 set forth herein. Responding Party objects to this Request on the grounds that the
22 terms “Attachment,” “Lunchbox Emails,” “Audio File,” and “Source Code,” as
23 defined by Plaintiff, are vague, ambiguous, overbroad, and unduly burdensome.
24 Responding Party further objects that the Request seeks information that is neither
25 relevant to the subject matter of the action nor reasonably calculated to lead to the
26 discovery of admissible evidence. Responding Party further objects that the Request
27 seeks an expert opinion. Responding Party further objects that the Request is
28 compound, containing multiple distinct inquiries within a single request, which is

1 improper under the applicable Rules.

2 Without waiving the foregoing objections, Responding Party responds as
3 follows: Responding Party has made a reasonable inquiry and lacks sufficient
4 information to admit or deny the Request, and therefore denies on that basis.

5 **REQUEST FOR ADMISSION NO. 4:**

6 Admit that the Attachment named “MarcosRitaAmazing (1).wav” in the
7 Lunchbox Emails is an Audio File and not Source Code.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

9 Responding Party hereby incorporates the General Objections as though fully
10 set forth herein. Responding Party objects to this Request on the grounds that the
11 terms “Attachment,” “Lunchbox Emails,” “Audio File,” and “Source Code,” as
12 defined by Plaintiff, are vague, ambiguous, overbroad, and unduly burdensome.
13 Responding Party further objects that the Request seeks information that is neither
14 relevant to the subject matter of the action nor reasonably calculated to lead to the
15 discovery of admissible evidence. Responding Party further objects that the Request
16 seeks an expert opinion. Responding Party further objects that the Request is
17 compound, containing multiple distinct inquiries within a single request, which is
18 improper under the applicable Rules.

19 Without waiving the foregoing objections, Responding Party responds as
20 follows: Responding Party has made a reasonable inquiry and lacks sufficient
21 information to admit or deny the Request, and therefore denies on that basis.

22 **REQUEST FOR ADMISSION NO. 5:**

23 Admit that You possess no file from the Lunchbox Emails whose MIME
24 metadata indicates a text/code type (including but not limited to text/plain, text/x-
25 python, application/x-javascript, or similar).

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

27 Responding Party hereby incorporates the General Objections as though fully
28 set forth herein. Responding Party objects to this Request on the grounds that the

1 term “Lunchbox Emails,” as defined by Plaintiff, is vague, ambiguous, overbroad,
2 and unduly burdensome. Responding Party further objects that the terms “text/code
3 type” and “including but not limited to,” and “or similar” are vague, ambiguous, and
4 overbroad. Responding Party further objects that the Request seeks information that
5 is neither relevant to the subject matter of the action nor reasonably calculated to
6 lead to the discovery of admissible evidence. Responding Party further objects that
7 the Request seeks an expert opinion.

8 Without waiving the foregoing objections, Responding Party responds as
9 follows: Responding Party has made a reasonable inquiry and lacks sufficient
10 information to admit or deny the Request, and therefore denies on that basis.

11 **REQUEST FOR ADMISSION NO. 6:**

12 Admit that You possess no file from the Lunchbox Emails with a filename
13 extension commonly associated with Source Code (including but not limited to .py,
14 .js, .ts, .java, .cpp, .c, .ipynb, .rb, .go, .sql, .sh, .ps1).

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

16 Responding Party hereby incorporates the General Objections as though fully
17 set forth herein. Responding Party objects to this Request on the grounds that the
18 terms “Lunchbox Emails” and “Source Code” as defined by Plaintiff are vague,
19 ambiguous, overbroad, and unduly burdensome. Responding Party further objects
20 that the terms “commonly associated” and “including but not limited to” are vague,
21 ambiguous, and overbroad. Responding Party further objects that the Request seeks
22 information that is neither relevant to the subject matter of the action nor reasonably
23 calculated to lead to the discovery of admissible evidence. Responding Party further
24 objects that the Request seeks an expert opinion.

25 Without waiving the foregoing objections, Responding Party responds as
26 follows: Responding Party has made a reasonable inquiry and lacks sufficient
27 information to admit or deny the Request, and therefore denies on that basis.

28 ///

1 **REQUEST FOR ADMISSION NO. 7:**

2 Admit that the bodies of the Lunchbox Emails state that Plaintiff was sending
3 older demo recordings from prior work and do not state that Plaintiff was sending
4 Checkmate, VoiceBite or Presto Source Code.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

6 Responding Party hereby incorporates the General Objections as though fully
7 set forth herein. Responding Party objects to this Request on the grounds that the
8 term “Lunchbox Emails,” as defined by Plaintiff, is vague, ambiguous, overbroad,
9 and unduly burdensome. Responding Party further objects that the terms “the
10 bodies,” “older demo recordings from prior work,” and “Presto Source Code” are
11 vague, ambiguous, and overbroad. Responding Party further objects that the Request
12 seeks information not within Responding Party’s possession, custody, or control.
13 Responding Party further objects that the Request seeks information that is neither
14 relevant to the subject matter of the action nor reasonably calculated to lead to the
15 discovery of admissible evidence. Responding Party further objects that the Request
16 seeks an expert opinion. Responding Party further objects that the Request is
17 compound, containing multiple distinct inquiries within a single request, which is
18 improper under the applicable Rules.

19 **REQUEST FOR ADMISSION NO. 8:**

20 Admit that You have not retained any expert or vendor who concluded that
21 any Attachment to the Lunchbox Emails is Source Code.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

23 Responding Party hereby incorporates the General Objections as though fully
24 set forth herein. Responding Party objects to this Request on the grounds that the
25 terms “Attachment,” “Lunchbox Emails,” and “Source Code,” as defined by
26 Plaintiff, are vague, ambiguous, overbroad, and unduly burdensome. Responding
27 Party further objects that the terms “any expert or vendor” are vague, ambiguous,
28 and overbroad. Responding Party further objects that the Request seeks information

1 that is neither relevant to the subject matter of the action nor reasonably calculated
2 to lead to the discovery of admissible evidence. Responding Party further objects
3 that the Request seeks an expert opinion. Responding Party further objects to this
4 Request to the extent it seeks information protected from disclosure by the attorney-
5 client privilege and/or the work product doctrine.

6 **REQUEST FOR ADMISSION NO. 9:**

7 Admit that You have not computed or received any file hash or signature
8 identifying any Attachment to the Lunchbox Emails as Source Code.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

10 Responding Party hereby incorporates the General Objections as though fully
11 set forth herein. Responding Party objects to this Request on the grounds that the
12 terms “Attachment,” “Lunchbox Emails” and “Source Code,” as defined by
13 Plaintiff, are vague, ambiguous, overbroad, and unduly burdensome. Responding
14 Party further objects that the terms “computed or received” and “any file hash or
15 signature” are vague, ambiguous, and overbroad. Responding Party further objects
16 to this Request in that the term “identifying” is vague, ambiguous, and overbroad.
17 To determine whether a document or thing “identifies” the facts recited in the
18 Request requires interpretation, and it is unclear from the Request in what manner
19 the information may “identify” such facts. Responding Party further objects that the
20 Request seeks information that is neither relevant to the subject matter of the action
21 nor reasonably calculated to lead to the discovery of admissible evidence.
22 Responding Party further objects that the Request seeks an expert opinion.

23 **REQUEST FOR ADMISSION NO. 10:**

24 Admit that You have no document (including any internal analysis) that
25 identifies any Attachment to the Lunchbox Emails as Source Code.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

27 Responding Party hereby incorporates the General Objections as though fully
28 set forth herein. Responding Party objects to this Request on the grounds that the

1 terms “Attachment,” “Lunchbox Emails” and “Source Code,” as defined by
2 Plaintiff, are vague, ambiguous, overbroad, and unduly burdensome. Responding
3 Party further objects that the terms “including any internal analysis” are vague,
4 ambiguous, and overbroad. Responding Party further objects to this Request in that
5 the term “identifies” is vague, ambiguous, and overbroad. To determine whether a
6 document or thing “identifies” the facts recited in the Request requires
7 interpretation, and it is unclear from the Request in what manner the information
8 may “identify” such facts. Responding Party further objects that the Request seeks
9 information that is neither relevant to the subject matter of the action nor reasonably
10 calculated to lead to the discovery of admissible evidence. Responding Party further
11 objects that the Request seeks an expert opinion. Responding Party further objects to
12 this Request to the extent it seeks information protected from disclosure by the
13 attorney-client privilege and/or the work product doctrine.

14 Without waiving the foregoing objections, Responding Party responds as
15 follows: Responding Party has made a reasonable inquiry and lacks sufficient
16 information to admit or deny the Request, and therefore denies on that basis.

17 **REQUEST FOR ADMISSION NO. 11:**

18 Admit that the Lunchbox Emails do not attach any repository export, archive,
19 or bundle (e.g., .zip, .tar, .gz, .7z) containing Source Code.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

21 Responding Party hereby incorporates the General Objections as though fully
22 set forth herein. Responding Party objects to this Request on the grounds that the
23 terms “Lunchbox Emails” and “Source Code,” as defined by Plaintiff, are vague,
24 ambiguous, overbroad, and unduly burdensome. Responding Party further objects
25 that the terms “any repository export, archive, or bundle (e.g., .zip, .tar, .gz, .7z)” are
26 vague, ambiguous, and overbroad. Responding Party further objects that the Request
27 seeks information that is neither relevant to the subject matter of the action nor
28 reasonably calculated to lead to the discovery of admissible evidence. Responding

1 Party further objects that the Request seeks an expert opinion. Responding Party
2 further objects that the Request is compound, containing multiple distinct inquiries
3 within a single request, which is improper under the applicable Rules.

4 **REQUEST FOR ADMISSION NO. 12A:**

5 Admit that the Lunchbox Emails do not attach any file named with or
6 referring to a code repository, branch, commit, or hash associated with VoiceBite,
7 Presto or Checkmate.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 12A:**

9 Responding Party hereby incorporates the General Objections as though fully
10 set forth herein. Responding Party objects to this Request on the grounds that the
11 term “Lunchbox Emails,” as defined by Plaintiff, is vague, ambiguous, overbroad,
12 and unduly burdensome. Responding Party further objects that the terms “any file,”
13 “code repository, branch, commit, or hash” and “associated with” are vague,
14 ambiguous, and overbroad. Responding Party further objects to this Request in that
15 the term “referring to” is vague, ambiguous, and overbroad. To determine whether a
16 document or thing “refers to” the facts recited in the Request requires interpretation,
17 and it is unclear from the Request in what manner the information may “refer to”
18 such facts. Responding Party further objects that the Request seeks information that
19 is neither relevant to the subject matter of the action nor reasonably calculated to
20 lead to the discovery of admissible evidence. Responding Party further objects that
21 the Request seeks an expert opinion. Responding Party further objects that the
22 Request is compound, containing multiple distinct inquiries within a single request,
23 which is improper under the applicable Rules.

24 **REQUEST FOR ADMISSION NO. 12B:**

25 Admit that the Lunchbox Emails do not contain any URL to a repository
26 (GitHub, GitLab, BitBucket or similar).

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 12B:**

28 Responding Party hereby incorporates the General Objections as though fully

1 set forth herein. Responding Party objects to this Request on the grounds that the
2 term “Lunchbox Emails,” as defined by Plaintiff, is vague, ambiguous, overbroad,
3 and unduly burdensome. Responding Party further objects that the terms “any URL”
4 and “repository (GitHub, GitLab, BitBucket or similar)” are vague, ambiguous, and
5 overbroad. Responding Party further objects that the Request seeks information that
6 is neither relevant to the subject matter of the action nor reasonably calculated to
7 lead to the discovery of admissible evidence. Responding Party further objects that
8 the Request seeks an expert opinion. Responding Party further objects that the
9 Request is compound, containing multiple distinct inquiries within a single request,
10 which is improper under the applicable Rules.

11 **REQUEST FOR ADMISSION NO. 13:**

12 Admit that You have no evidence that Plaintiff transmitted Checkmate,
13 VoiceBite or Presto Source Code to Lunchbox in the Lunchbox Emails.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

15 Responding Party hereby incorporates the General Objections as though fully
16 set forth herein. Responding Party objects to this Request on the grounds that the
17 term “Lunchbox Emails,” as defined by Plaintiff, is vague, ambiguous, overbroad,
18 and unduly burdensome. Responding Party further objects that the terms
19 “transmitted” and “Presto Source Code” are vague, ambiguous, and overbroad.
20 Responding Party further objects that the Request seeks information that is neither
21 relevant to the subject matter of the action nor reasonably calculated to lead to the
22 discovery of admissible evidence. Responding Party further objects that the Request
23 seeks an expert opinion. Responding Party further objects that the Request is
24 compound, containing multiple distinct inquiries within a single request, which is
25 improper under the applicable Rules.

26 Without waiving the foregoing objections, Responding Party responds as
27 follows: Deny.

28 ///

1 **REQUEST FOR ADMISSION NO. 14A:**

2 Admit that the only Attachments to the Lunchbox Emails in Your possession
3 are Audio Files.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 14A:**

5 Responding Party hereby incorporates the General Objections as though fully
6 set forth herein. Responding Party objects to this Request on the grounds that the
7 terms “Attachments,” “Lunchbox Emails,” and “Audio Files,” as defined by
8 Plaintiff, are vague, ambiguous, overbroad, and unduly burdensome. Responding
9 Party further objects that the Request seeks information that is neither relevant to the
10 subject matter of the action nor reasonably calculated to lead to the discovery of
11 admissible evidence. Responding Party further objects that the Request seeks an
12 expert opinion.

13 Without waiving the foregoing objections, Responding Party responds as
14 follows: Deny.

15 **REQUEST FOR ADMISSION NO. 14B:**

16 Admit that each such attachment has a MIME Content-Type beginning with
17 audio/.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 14B:**

19 Responding Party hereby incorporates the General Objections as though fully
20 set forth herein. Responding Party objects to this Request on the grounds that the
21 terms “each such attachment” are so vague, ambiguous, and overbroad as to render
22 the Request unintelligible. Responding Party further objects that the terms “MIME
23 Content-Type beginning with audio/” are vague, ambiguous, and overbroad.
24 Responding Party further objects that the Request seeks information that is neither
25 relevant to the subject matter of the action nor reasonably calculated to lead to the
26 discovery of admissible evidence. Responding Party further objects that the Request
27 seeks an expert opinion.

28 Without waiving the foregoing objections, Responding Party responds as

1 follows: Given that the Request is unintelligible, Responding Party lacks the ability
2 to admit or deny it, and on that basis denies the Request.

3 **REQUEST FOR ADMISSION NO. 15:**

4 Admit that characterizing the Attachments to the Lunchbox Emails as “code”
5 would be inaccurate because they are Audio Files.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

7 Responding Party hereby incorporates the General Objections as though fully
8 set forth herein. Responding Party objects to this Request on the grounds that the
9 terms “Attachments” and “Lunchbox Emails,” as defined by Plaintiff, are vague,
10 ambiguous, overbroad, and unduly burdensome. Responding Party further objects
11 that the terms “code” and “would be inaccurate” are vague, ambiguous, and
12 overbroad. Responding Party further objects to this Request in that the term
13 “characterizing” is vague, ambiguous, and overbroad. To determine whether a
14 document or thing “characterizes” the facts recited in the Request requires
15 interpretation, and it is unclear from the Request in what manner the information
16 may “characterize” such facts. Responding Party further objects that the Request
17 seeks information that is neither relevant to the subject matter of the action nor
18 reasonably calculated to lead to the discovery of admissible evidence. Responding
19 Party further objects that the Request seeks an expert opinion.

20 **REQUEST FOR ADMISSION NO. 16:**

21 Admit that You are able to produce the Lunchbox Emails in native .eml
22 format with full headers and all Attachments in native format.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

24 Responding Party hereby incorporates the General Objections as though fully
25 set forth herein. Responding Party objects to this Request on the grounds that the
26 terms “Attachments” and “Lunchbox Emails,” as defined by Plaintiff, are vague,
27 ambiguous, overbroad, and unduly burdensome. Responding Party further objects to
28 this Request in that the terms “able to produce” and “native .eml format” are vague,

1 ambiguous, and overbroad. Responding Party further objects that the Request seeks
2 information not within Responding Party's possession, custody, or control.
3 Responding Party further objects that the Request seeks information that is neither
4 relevant to the subject matter of the action nor reasonably calculated to lead to the
5 discovery of admissible evidence.

6 **REQUEST FOR ADMISSION NO. 17:**

7 Admit that none of the Lunchbox Email Attachments includes any text
8 segment that contains programming syntax for a programming language.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

10 Responding Party hereby incorporates the General Objections as though fully
11 set forth herein. Responding Party objects to this Request on the grounds that the
12 terms "Attachments" and "Lunchbox Emails" as defined by Plaintiff are vague,
13 ambiguous, overbroad, and unduly burdensome. Responding Party further objects to
14 this Request in that the terms "any text segment" and "programming syntax for a
15 programming language" are so vague, ambiguous, and overbroad as to render the
16 request unintelligible. Responding Party further objects that the Request seeks
17 information that is neither relevant to the subject matter of the action nor reasonably
18 calculated to lead to the discovery of admissible evidence. Responding Party further
19 objects that the Request seeks an expert opinion.

20 Without waiving the foregoing objections, Responding Party responds as
21 follows: Given that the Request is unintelligible, Responding Party lacks the ability
22 to admit or deny it, and on that basis denies the Request.

23 **REQUEST FOR ADMISSION NO. 18A:**

24 Admit that the body of the Lunchbox Emails does not contain the word
25 "code".

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 18A:**

27 Responding Party hereby incorporates the General Objections as though fully
28 set forth herein. Responding Party objects to this Request on the grounds that the

1 term “Lunchbox Emails,” as defined by Plaintiff, is vague, ambiguous, overbroad,
2 and unduly burdensome. Responding Party further objects to this Request in that the
3 term “body” is so vague, ambiguous, and overbroad as to render the request
4 unintelligible. Responding Party further objects that the Request seeks information
5 that is neither relevant to the subject matter of the action nor reasonably calculated
6 to lead to the discovery of admissible evidence.

7 Without waiving the foregoing objections, Responding Party responds as
8 follows: Given that the Request is unintelligible, Responding Party lacks the ability
9 to admit or deny it, and on that basis denies the Request.

10 **REQUEST FOR ADMISSION NO. 18B:**

11 Admit that You have no record that Lunchbox (or Nabeel) replied
12 acknowledging receipt of “code” from Plaintiff in the Lunchbox Emails.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 18B:**

14 Responding Party hereby incorporates the General Objections as though fully
15 set forth herein. Responding Party objects to this Request on the grounds that the
16 term “Lunchbox Emails,” as defined by Plaintiff, is vague, ambiguous, overbroad,
17 and unduly burdensome. Responding Party further objects to this Request in that the
18 term “code” is vague, ambiguous, and overbroad. Responding Party further objects
19 that the Request seeks information that is neither relevant to the subject matter of the
20 action nor reasonably calculated to lead to the discovery of admissible evidence.
21 Responding Party further objects that the Request is compound, containing multiple
22 distinct inquiries within a single request, which is improper under the applicable
23 Rules.

24 Without waiving the foregoing objections, Responding Party responds as
25 follows: Deny.

26 **REQUEST FOR ADMISSION NO. 19:**

27 Admit that none of the Lunchbox Email Attachments was marked or
28 designated by You as “confidential code,” “source,” “trade secret code,” or similar.

RESPONSE TO REQUEST FOR ADMISSION NO. 19:

Responding Party hereby incorporates the General Objections as though fully set forth herein. Responding Party objects to this Request on the grounds that the terms “Attachments” and “Lunchbox Emails,” as defined by Plaintiff, are vague, ambiguous, overbroad, and unduly burdensome. Responding Party further objects to this Request in that the terms “marked or designated” and “‘confidential code,’ ‘source,’ ‘trade secret code,’ or similar” is vague, ambiguous, and overbroad. Responding Party further objects that the Request seeks information that is neither relevant to the subject matter of the action nor reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects that the Request is compound, containing multiple distinct inquiries within a single request, which is improper under the applicable Rules.

REQUEST FOR ADMISSION NO. 20:

Admit that You have no basis to contend that the Lunchbox Email Attachments are anything other than Audio Files.

RESPONSE TO REQUEST FOR ADMISSION NO. 20:

Responding Party hereby incorporates the General Objections as though fully set forth herein. Responding Party objects to this Request on the grounds that the terms “Attachments,” “Lunchbox Emails,” and “Audio Files,” as defined by Plaintiff, are vague, ambiguous, overbroad, and unduly burdensome. Responding Party further objects to this Request in that the terms “are anything other than” are vague, ambiguous, and overbroad. Responding Party further objects that the Request seeks information that is neither relevant to the subject matter of the action nor reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects that the Request seeks an expert opinions. Responding Party further objects that the Request calls for a legal conclusion rather than a factual response.

Without waiving the foregoing objections, Responding Party responds as

1 follows: Deny.

2 **REQUEST FOR ADMISSION NO. 21:**

3 Admit that, after a reasonable inquiry and as of the date of Your response, the
4 only Documents You rely on to support the Competitive Activity Allegations are the
5 Lunchbox Emails and their Attachments.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

7 Responding Party hereby incorporates the General Objections as though fully
8 set forth herein. Responding Party objects to this Request on the grounds that the
9 terms “Attachments” and “Lunchbox Emails,” as defined by Plaintiff, are vague,
10 ambiguous, overbroad, and unduly burdensome. Responding Party further objects to
11 this Request in that the term “Competitive Activity Allegations” is vague,
12 ambiguous, and overbroad. Responding Party further objects that the Request is
13 compound, containing multiple distinct inquiries within a single request, which is
14 improper under the applicable Rules. Responding Party further objects to this
15 Request to the extent it seeks information protected from disclosure by the attorney-
16 client privilege and/or the work product doctrine.

17 Without waiving the foregoing objections, Responding Party responds as
18 follows: Deny.

19 **REQUEST FOR ADMISSION NO. 22:**

20 Admit that, after a reasonable inquiry and as of the date of Your response,
21 You do not possess any communication from Plaintiff to any then-current
22 Checkmate employee expressly asking that employee to terminate employment to
23 accept a specific role.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

25 Responding Party hereby incorporates the General Objections as though fully
26 set forth herein. Responding Party objects to this Request in that the term “any then-
27 current Checkmate employee” is vague, ambiguous, and overbroad. Responding
28 Party further objects that the Request seeks information not within Responding

1 Party's possession, custody, or control. Responding Party further objects that the
2 Request is compound, containing multiple distinct inquiries within a single request,
3 which is improper under the applicable Rules. Responding Party further objects that
4 the Request calls for a legal conclusion rather than a factual response.

5 Without waiving the foregoing objections, Responding Party responds as
6 follows: Deny.

7 **REQUEST FOR ADMISSION NO. 23:**

8 Admit that, after a reasonable inquiry and as of the date of Your response,
9 You do not possess any communication from Plaintiff to any Checkmate customer
10 requesting that the customer move existing business from Checkmate.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

12 Responding Party hereby incorporates the General Objections as though fully
13 set forth herein. Responding Party objects to this Request in that the terms "any
14 Checkmate customer" and "existing business" are vague, ambiguous, and
15 overbroad. Responding Party further objects that the Request seeks information not
16 within Responding Party's possession, custody, or control. Responding Party further
17 objects that the Request is compound, containing multiple distinct inquiries within a
18 single request, which is improper under the applicable Rules.

19 Without waiving the foregoing objections, Responding Party responds as
20 follows: Deny.

21 **REQUEST FOR ADMISSION NO. 24:**

22 Admit that, after a reasonable inquiry and as of the date of Your response,
23 You do not possess any Document showing that before November 14, 2024 Plaintiff
24 engaged in a "Competing Business" as that term is used in any Checkmate
25 agreement.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

27 Responding Party hereby incorporates the General Objections as though fully
28 set forth herein. Responding Party objects to this Request in that the terms

1 “Competing Business” and “any Checkmate agreement” are vague, ambiguous, and
2 overbroad. Responding Party further objects to this Request in that the term
3 “showing” is vague, ambiguous, and overbroad. To determine whether a document
4 or thing “shows” the facts recited in the Request requires interpretation, and it is
5 unclear from the Request in what manner the information may “show” such facts.
6 Responding Party further objects that the Request seeks information not within
7 Responding Party’s possession, custody, or control. Responding Party further
8 objects that the Request is compound, containing multiple distinct inquiries within a
9 single request, which is improper under the applicable Rules.

10 Without waiving the foregoing objections, Responding Party responds as
11 follows: Deny.

12 **REQUEST FOR ADMISSION NO. 25:**

13 Admit that, after a reasonable inquiry and as of the date of Your response,
14 You do not possess any communication (other than the Lunchbox Emails) in which
15 Plaintiff represented that he sent or would send source code to any third party.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

17 Responding Party hereby incorporates the General Objections as though fully
18 set forth herein. Responding Party objects to this Request on the grounds that the
19 term “Lunchbox Emails,” as defined by Plaintiff, is vague, ambiguous, overbroad,
20 and unduly burdensome. Responding Party further objects to this Request in that the
21 terms “source code” and “any third party” are vague, ambiguous, and overbroad.
22 Responding Party further objects to this Request in that the term “represented” is
23 vague, ambiguous, and overbroad. To determine whether a document or thing
24 “represents” the facts recited in the Request requires interpretation, and it is unclear
25 from the Request in what manner the information may “represent” such facts.
26 Responding Party further objects that the Request seeks information not within
27 Responding Party’s possession, custody, or control. Responding Party further
28 objects that the Request is compound, containing multiple distinct inquiries within a

1 single request, which is improper under the applicable Rules.

2 **REQUEST FOR ADMISSION NO. 26:**

3 Admit that, after a reasonable inquiry and as of the date of Your response,
4 You have not identified any person You contend Plaintiff actually solicited to leave
5 Checkmate.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

7 Responding Party hereby incorporates the General Objections as though fully
8 set forth herein. Responding Party objects to this Request in that the terms “any
9 person code” and “actually solicited” are vague, ambiguous, and overbroad.
10 Responding Party further objects to this Request in that the term “identified” is
11 vague, ambiguous, and overbroad. To determine whether a document or thing
12 “identifies” the facts recited in the Request requires interpretation, and it is unclear
13 from the Request in what manner the information may “identify” such facts.
14 Responding Party further objects that the Request is compound, containing multiple
15 distinct inquiries within a single request, which is improper under the applicable
16 Rules. Responding Party further objects that the Request calls for a legal conclusion
17 rather than a factual response.

18 Without waiving the foregoing objections, Responding Party responds as
19 follows: Deny.

20 **REQUEST FOR ADMISSION NO. 27:**

21 Admit that the Lunchbox Emails (dated November 7-8) post-date Plaintiff’s
22 written demands for payment of his partial/signing bonus in early November 2024
23 (dated November 4).

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

25 Responding Party hereby incorporates the General Objections as though fully
26 set forth herein. Responding Party objects to this Request on the grounds that the
27 term “Lunchbox Emails,” as defined by Plaintiff, is vague, ambiguous, overbroad,
28 and unduly burdensome. Responding Party further objects to this Request in that the

1 terms “written demands” and “partial/signing bonus” are vague, ambiguous, and
2 overbroad. Responding Party further objects that the Request seeks information that
3 is neither relevant to the subject matter of the action nor reasonably calculated to
4 lead to the discovery of admissible evidence.

5 Without waiving the foregoing objections, Responding Party responds as
6 follows: Deny.

7
8
9 Date: September 15, 2025

K&L GATES LLP



10
11
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23 *Claimant CHECKMATE.COM INC*
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PROOF OF SERVICE

Case No. 2:25-CV-00765-MEMF-JPR

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is K&L GATES LLP, 10100 Santa Monica Boulevard, Eighth Floor, Los Angeles, California 90067.

On **September 15, 2025**, I served the document(s) described as:

CHECKMATE.COM, INC.'S RESPONSES TO PLAINTIFF ARJUN VASAN'S FIRST SET OF REQUESTS FOR ADMISSIONS

on the person or person(s) below, as follows:

Arjun Vasan
12615 193rd Street
Cerritos, CA 90703
Email: arjun.vasan@gmail.com
Telephone: 562-900-6541

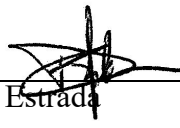
Plaintiff Pro Se

The documents were served by the following means:

- ☐ **BY U.S. MAIL:** I caused such envelope(s) to be deposited in the mail at Los Angeles, California with postage thereon fully prepaid to the office of the addressee(s) as indicated above. I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day, with postage fully prepaid, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.
- ☒ **BY ELECTRONIC SERVICE:** by transmitting a true copy of the foregoing document(s) to the email-addresses set forth as stated above.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **September 15, 2025**, at Los Angeles, California.


Dyana Estrada